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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

In re: <b>Earthsnap, Inc.</b>	§	Case No. 24-60363
	§	
<i>Debtor</i>	§	Chapter 11, Subchapter V
	§	
	§	(Jointly Administered)

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In re: <b>Eric Ralls</b>	§	Case No. 24-60504
	§	
<i>Debtor</i>	§	Chapter 11, Subchapter V
	§	

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**DESIGNATION OF RECORD ON APPEAL AND  
IDENTIFICATION OF ISSUES PRESENTED**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW Earthsnap, Inc. (“Earthsnap”) and Eric Ralls (“Ralls”) (Earthsnap and Ralls collectively “**Appellants**” or individually an “**Appellant**”), Appellants, and file this their Designation of Record on Appeal and Identification of Issues Presented (the “**Designation**”). Appellant designates the following documents as part of the record on appeal:

	From Case No. 24-60303 (Earthsnap)	Date Filed	ECF No.
1.	Notice of Appeal and Statement of Election	6/24/2025	198
2.	Order Appealed #1 (Order Denying Motion to Reconsider)	6/10/2025	191
3.	Order Appealed #2 (Order Granting Motion to Convert)	4/21/2025	167

4.	Docket Sheet	N/A	N/A
5.	Original Chapter 11 Petition	6/17/2024	1
6.	Notice of Meeting of Creditors	6/20/2024	3
7.	Original Schedules	7/2/2024	7
8.	Original Statement of Financial Affairs	7/2/2024	9
9.	Amended Chapter 11 Petition	7/22/2024	12
10.	Amended Schedules	7/22/2024	13
11.	Amended Statement of Financial Affairs	7/22/2024	14
12.	Amended creditor matrix	7/23/2024	15
13.	Application to Employe Attorney	7/30/2024	18
14.	Debtor's Subchapter V Consensual Reorganization Report	8/4/2024	20
15.	Debtor's Amended Subchapter V Consensual Reorganization Report	8/5/2024	21
16.	Motion for Joint Administration	8/21/2024	25
17.	Order Dismissing Without Prejudice Motion for Joint Administration	8/23/2024	26
18.	Amended Motion for Joint Administration	8/27/2024	28
19.	Order Approving Employment of Attorney	9/3/2024	31
20.	Motion to Extend Time to File Chapter 11 Subchapter V Plan	9/16/2024	34
21.	Operating Report (07-2024)	10/8/2024	42
22.	Operating Report (06-2024)	10/8/2024	43
23.	Operating Report (08-2024)	10/8/2024	44
24.	Operating Report (09-2024)	10/8/2024	45
25.	Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	10/11/2024	46
26.	Second Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	10/16/2024	49
27.	Order Granting Joint Administration of Bankruptcy Estates	10/17/2024	50
28.	Motion to Continue Hearing ( <i>Emergency</i> )	11/19/2024	60
29.	Second Motion to Continue Hearing	11/27/2024	63
30.	Debtor's Subchapter V Consensual Reorganization Report	12/10/2024	66
31.	Operating Report (10-2024)	12/19/2024	67
32.	Operating Report (11-2024)	12/19/2024	68
33.	Order Granting Second Amended Motion to Extend Time to File Chapter 11 Subchapter V Plan	12/20/2024	69
34.	Motion to Compel Debtor to Comply with 2004 Discovery Order	12/20/2024	70
35.	Amended Motion to Compel Debtor to Comply with 2004 Discovery Order	12/23/2024	72

36.	Motion to Compel Debtor to Comply with 2004 Discovery Order	12/23/2024	73
37.	Transcript of Hearing Held on 12/19/2024	1/2/2025	74
38.	Chapter 11 Small Business Subchapter V Plan	1/16/2025	75
39.	Order Granting HI Investments, LLC's Motion To Compel Debtor to Comply with October 25, 2024 Order Granting Rule 2004 Discovery	1/17/2025	76
40.	Order Granting Plantsnap Inc.'s Motion To Compel Debtor to Comply with September 17, 2024 Order Granting Rule 2004 Discovery	1/17/2025	77
41.	Application to Employ Jonathan Solsbery, Solsbery CPA, LLC	1/30/2025	86
42.	Request for Expedited Hearing On <i>Discovery Matters</i> Filed by HI Investments, LLC	2/5/2025	87
43.	Order Granting Expedited Hearing Regarding Discovery Matters	2/6/2025	88
44.	Order Dismissing Employment Application of Jonathan Solsbery, Solsbery CPA, LLC as Accountant for the Estate	2/11/2025	93
45.	Order To Show Cause Why Case Should Not Be Dismissed Or Converted For Cause Under § 1112.	2/13/2025	94
46.	Joint Motion to Convert Chapter 11 Case to Chapter 7 Case Without Waiver of 30-Day Hearing Requirement Filed by PlantSnap Inc	2/17/2025	97
47.	Operating Report (12-2024)	2/24/2025	99
48.	Operating Report (01-2025)	2/24/2025	100
49.	Joinder in Support of <i>PlantSnap Inc. and DEJ Partners, LLC's Joint Motion to Convert Chapter 11 Cases</i> Filed by HI Investments, LLC	3/3/2025	101
50.	Joint Objection to Confirmation of Chapter 11 Plan Filed by PlantSnap Inc.	3/4/2025	103
51.	Objection to Confirmation of Chapter 11 Plan Filed by HI Investments, LLC	3/5/2025	104
52.	Objection to Confirmation of Chapter 11 Plan Filed by Amazon Web Services, Inc	3/5/2025	105
53.	Unopposed Request for Emergency Hearing On the March 19, 2025 Hearing Filed by PlantSnap Inc.	3/11/2025	107
54.	Motion to Continue Hearing ( <i>Emergency</i> ) ( <i>Opposed</i> ) Filed by EarthSnap, Inc.	3/13/2025	110
55.	Request for Emergency Hearing On <i>Motion for Continuance</i> Filed by EarthSnap, Inc.	3/13/2025	111
56.	Joint Objection Filed by PlantSnap Inc.	3/13/2025	112
57.	Order Denying Emergency Motion for Continuance	3/14/2025	114

58.	Witness & Exhibit List	3/14/2025	115
59.	Witness & Exhibit List	3/14/2025	116
60.	Witness & Exhibit List	3/14/2025	117
61.	Witness & Exhibit List	3/14/2025	118
62.	Supplemental Witness & Exhibit List	3/18/2025	122
63.	Supplemental Witness & Exhibit List	3/18/2025	123
64.	Amended Witness & Exhibit List	3/19/2025	124
65.	Supplemental Witness & Exhibit List	3/21/2025	128
66.	Transcript of Hearing on 3/25/2025 (to be ordered)	3/25/2025	N/A
67.	Application to Employ	3/26/2025	134
68.	Amended Operating Report (2024-06)	3/28/2025	135
69.	Amended Operating Report (2024-07)	3/28/2025	136
70.	Amended Operating Report (2024-08)	3/28/2025	137
71.	Amended Operating Report (2024-09)	3/28/2025	138
72.	Amended Operating Report (2024-10)	3/29/2025	140
73.	Application to Employ Accountant	3/30/2025	141
74.	Amended Operating Report (2024-11)	3/30/2025	142
75.	Amended Operating Report (2024-12)	3/30/2025	143
76.	Amended Operating Report (2025-01)	3/30/2025	144
77.	Amended Operating Report (2025-02)	3/30/2025	145
78.	Amended Schedules	4/1/2025	146
79.	Amended Operating Report (2024-06) (to add signatures only)	4/1/2025	147
80.	Amended Operating Report (2024-07) (to add signatures only)	4/1/2025	148
81.	Amended Operating Report (2024-08) (to add signatures only)	4/1/2025	149
82.	Amended Operating Report (2024-09) (to add signatures only)	4/1/2025	150
83.	Amended Operating Report (2024-10) (to add signatures only)	4/1/2025	151
84.	Amended Operating Report (2024-11) (to add signatures only)	4/1/2025	152
85.	Amended Operating Report (2024-12) (to add signatures only)	4/1/2025	153
86.	Amended Operating Report (2025-01) (to add signatures only)	4/1/2025	154
87.	Amended Operating Report (2025-02) (to add signatures only)	4/1/2025	155
88.	Amended Operating Report (2024-12) (to add non-DIP bank statement)	4/6/2025	156
89.	Amended Operating Report (2025-01) (to add final non-DIP bank statements)	4/6/2025	157

90.	Operating Report (2024-08) (Jointly Administered Debtor Eric Ralls)	4/9/2025	159
91.	Operating Report (2024-09) (Jointly Administered Debtor Eric Ralls)	4/9/2025	160
92.	Operating Report (2024-10) (Jointly Administered Debtor Eric Ralls)	4/9/2025	161
93.	Operating Report (2024-11) (Jointly Administered Debtor Eric Ralls)	4/9/2025	162
94.	Operating Report (2024-12) (Jointly Administered Debtor Eric Ralls)	4/9/2025	163
95.	Operating Report (2025-01) (Jointly Administered Debtor Eric Ralls)	4/9/2025	164
96.	Operating Report (2025-02) (Jointly Administered Debtor Eric Ralls)	4/9/2025	165
97.	Amended Chapter 11 Small Business Subchapter V Plan	4/13/2025	166
98.	Motion to Reconsider	5/5/2025	176
99.	Motion to Withdraw as Attorney	5/12/2025	178
100.	Amended Motion to Withdraw as Attorney	5/14/2025	179
101.	Joint Objection Filed by Plantsnap, Inc.	5/22/2025	180
102.	Amended Statement of Financial Affairs	5/22/2025	181
103.	Operating Report (2025-03)	5/23/2025	183
104.	Amended Schedules	5/23/2025	184
105.	Joinder in Support of <i>PlantSnap Inc. and DEJ Partners, LLC's Joint Opposition to Debtors' Motion for Reconsideration Regarding Order Converting Cases to Chapter 7</i> Filed by HI Investments, LLC	5/27/2025	186
106.	Joinder in Support of <i>Joint Opposition to Debtors' Motion for Reconsideration Regarding Order Converting Cases to Chapter 7</i> Filed by Areya Aurzada	5/27/2025	187
107.	Amended Operating Report (2025-03)	5/28/2025	189
108.	Objection to Motion to Withdraw as Attorney	6/3/2025	190
109.	Order Granting Amended Motion To Withdraw As Attorney	6/10/2025	192
	<b>From Case No. 24-60504 (Eric Ralls)</b>	<b>Date Filed</b>	<b>ECF No.</b>
110.	Chapter 11 Subchapter V Voluntary Petition	8/18/2024	1
111.	Original Schedules	9/3/2024	11
112.	Original Statement of Financial Affairs	9/3/2024	12
113.	Amended Schedules	9/25/2024	14
114.	Amended Statement of Financial Affairs	9/25/2024	15
115.	Order Granting Joint Administration Of Bankruptcy Estates	10/17/2024	21

116.	Operating Report (2024-09)	12/28/2024	36
117.	Operating Report (2024-10)	12/28/2024	37
118.	Operating Report (2024-11)	12/28/2024	38
119.	Operating Report (2025-01)	3/12/2025	39
120.	Motion to Withdraw as attorney	5/13/2025	47
121.	Amended Motion to Withdraw as attorney	5/14/2025	48
122.	Objection Filed by HI Investments, LLC	6/3/2025	49
123.	Motion to Reconsider <i>Order of Conversion</i> ( <i>Copy of Motion filed in Case #: 24-60303 (Dkt. No. 176 therein) on May 5, 2025</i> )	6/3/2025	50
124.	Order granting Amended Motion to Withdraw	6/10/2025	52

**Statement of Issues to Be Presented on Appeal**

Appellant hereby states that the issues to be presented on appeal are as follows:

1. Whether the trial court erred in converting Appellants' chapter 11 bankruptcy cases to chapter 7;
2. Whether the trial court erred in denying Appellants' Motion for Reconsideration regarding Order Converting Cases to Chapter 7.

**DATED this 13<sup>th</sup> day of July, 2025**

Respectfully submitted,

**THE MITCHELL LAW FIRM, L.P.**

**/s/ Gregory W. Mitchell**

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**CERTIFICATE OF SERVICE**

I hereby certify that on **July 13, 2025**, a true and correct copy of the foregoing was served via U.S. Mail and/or via the court's ECF system to all parties receiving notice via the Court's ECF system.

**/s/ Gregory W. Mitchell**

Gregory W. Mitchell

Attorney for Debtors/Appellants